



U.S. Department of Justice

United States Attorney
Southern District of New York

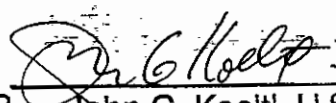
86 Chambers Street, 3rd floor
New York, New York 10007

May 31, 2017

BY ECF

The Honorable John G. Koeltl
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED
SO ORDERED

6/1/17 
John G. Koeltl, U.S.D.J.

Re: *Flores v. United States Dep't of Justice*,
No. 17 Civ. 0036 (JGK)

Dear Judge Koeltl:

This Office represents the United States Department of Justice ("the Government"), the defendant in the above-referenced case, which arises under the Freedom of Information Act ("FOIA"). I write respectfully to request that the Court order one additional production deadline past the schedule that is currently in place, in order to allow the Government to complete its release of non-privileged documents responsive to Plaintiff's FOIA requests. I have sought Plaintiff's position on this application, but have not yet received his response.

On April 17, 2017, the Court ordered the Government to make its first release of documents responsive to Plaintiff's FOIA requests on April 27, 2017, and to complete its release of responsive documents by June 2, 2017 (Dkt. No. 16). As the Government explained in its status report dated May 25, 2017, the Government did make its first release on April 27 (Dkt. No. 20). The Government intends to make a second release on June 2, 2017, which will include the entirety of the first release, in light of Plaintiff's contention that he has not yet received that entire release. The second release also will include additional responsive materials. However, the Government respectfully requests the Court's leave to complete its FOIA production by June 16, 2017. The reason for this request is the Government's need to collect responsive materials from additional locations and to obtain agency consultation, review, and approval regarding its final release.

This is the Government's first request for an additional production deadline in this case. Although, as stated above, Plaintiff has not yet provided his position with respect to this particular application, the Government notes that in his letter dated May 16, 2017, Plaintiff himself asked the Court to extend the deadlines currently in place in the event

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#
DATE FILED: 6-1-17

Hon. John G. Koeltl
May 31, 2017
Page 2

the Government needed additional time to complete its release of responsive materials (Dkt. No. 18). Thank you for your attention to this matter.

Respectfully,
JOON H. KIM
Acting United States Attorney

By: /s/ Rebecca S. Tinio
REBECCA S. TINIO
Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, New York 10007
Tel. (212) 637-2774
Fax (212) 637-2702

cc (via ECF): Louis Flores